

Pp. 2#

U.S. District Court  
EASTERN DIST. OF NEW YORK  
BROOKLYN

Civil Docket For Case **CV#14-7108**

DATED: NOV. 30, 2014

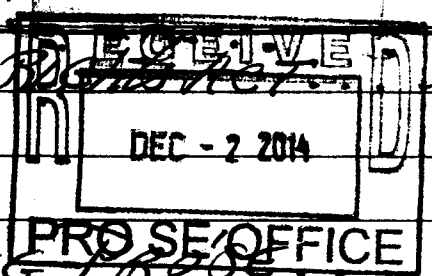
BARLOW, V. ATTY. RANDY MASTRO, ETAL

Assigned To U.S. JUDGE

☐ ORIGINAL

Referred To: MAGISTRATE

CAUSE: 42:1983 @ 1965 CIVIL RIGHTS ACT  
KONTZ, J.



Plaintiff

CLINTON C. BARLOW, III, ACTING PRO SE

P.O. BOX 2134

Y.

TRENTON, NJ 08607

Defendant(s)

ATTY. RANDY MASTRO, ESQ. % GOVERNOR

N.J. GOVERNOR CHRIS CHRISTOPHER CHRISTIE, ESQ.

N.J. S.D.A. CEO CHARLES A. MCKENNA, ESQ.

N.J. S.D.A. OFFICIALS (T.C.H.S.) MANNY DA SILVA

N.J. TRENTON BOARD OF EDUCATION ATTORNEY

N.J. T.B.E. PURCHASER AGENT GEORGETTE BOWMAN

N.J. T.B.E. SUPERINTENDENT DR. FRANCISCO DURAN

N.J. TRENTON MAYOR ERIC JACKSON, CITY OF TRENTON

% N.J. T.B.E. 108 N. CLINTON AVE. TRENTON, NJ 08608

% N.J. TRENTON CITY HALL, 319 E. STATE ST., TRENTON, NJ 08608

% N.J. S.D.A., 32 E. FRONT STREET, P.O. BOX 991, ...

TRENTON, NJ 08625, 0991 in % CORP. ATTORNEY

MR. RANDY MASTRO, ESQ., ATT. AT LAW

LAW FIRM OF GIBSON DUNN, ADDRESS OF

200 PARK AVE., N.Y., NEW YORK, 10166, ETAL'S

Mr. Clinton C. Barlow, III, N.J.H.I.C. Contractor  
P.O. Box 2134, Trenton, N.J. 08607

..... PROSE PLAINTIFF.....  
-V-

STATE OF N.J. County of MERCER, in the City of.  
Trenton, Trenton Board of Education, Superintendent,  
Attorney Randy MASTRO, Esq., of N.Y.,  
N.J. Governor Christopher CHRISTIE, Esq.  
N.J. S.P.A. CEO CHARLES B. MCKENNA,  
N.J. S.P.A. Official (% T.C.H.S.) MANNY DASILVA,  
N.J. Trenton Board of Education, Attorney....."  
N.J. T.B.E. Purchase Agent GEORGETTE BOWMAN,  
N.J. T.B.E. Superintendent DR. FRANCISCO DURAN,  
N.J. Trenton Mayor ERIC JACKSON, City of Trenton,  
N.J. Trenton City Council Bd. Members, And...  
Trenton Bd. of Education, 108 N. Clinton Ave.  
Trenton, N.J. 08609 And Trenton City Hall At...  
319 EAST STATE Street, Trenton, N.J. 08608, And  
% N.J. S.P.A.; 32 E. Front Street, P.O. Box 991 #,  
Trenton, N.J. 08623-0991, ETAL'S  
DEFENDANTS

"EMERGENT APPLICATION VIOLATION"

Pursuant to Fed. Rules Civil Proc, Please NOW...  
Accept And File This EMERGENT FEDERAL COURT  
Application to STAY INJUNCTION AGAINST STATE  
OF N.J. S.P.A., T.B.E. Construction Demo Project,  
Until I, Mr. Clinton C. Barlow, III, Can Rightfully  
Retrieve All old Junk from T.C.H.S. Bld G."

MR. CLINTON C. BARLOW, III, PLAINTIFF...  
V.  
ALLY RANDY — MASTRO, ESQ., N.J. GOVERNOR...  
CHRIS (CHRISTOPHER) CHRISTIE, ESQ., N.J. S.D.A...  
CEO CHARLES A. MCKENNA, ESQ., N.J. S.D.A...  
% (T.C.H.S.) MANNY DA SILVA, TRENTON BOARD OF EDUCATION; ATTORNEY, N.J. T.B.E. PURCHASER...  
GEORGETTE BOUMAN, N.J. T.B.E. SUPERINTENDENT  
DR. FRANCISCO DURAN, N.J. TRENTON MAYOR...  
ERIC JACKSON, CITY OF TRENTON, DEFENDANTS,

“STATEMENT OF CLAIMS”

NOTICES ARE HEREBY GIVEN TO THE U.S. President B. Obama, N.J. STATE GOVERNOR CHRIS CHRISTIE, ESQ., N.J. MERCER COUNTY... EXECUTIVE BRIAN HUGHES, N.J. TRENTON CITY... MAYOR ERIC JACKSON, BOTH U.S. AND N.J... SENATORS, COUNTY FREEHOLDERS, TRENTON SCHOL Bd. OF EDUC., AND CITY OF TRENTON COUNCIL Members, That I, Mr. Clinton C. Barlow, III is FILING SEVERAL U.S. FEDERAL CIVIL RIGHTS, CIVIL RIGHTS AND BREACH OF CONTRACTS, CLAIMS, NO BIDDING CONTRACTS AGAINST THE ABOVE... DEFENDANTS FOR HURT DISCRIMINATION AGAINST - ME, MR. CLINTON C. BARLOW, III AS OF 10/30/14.

"COUNT ONE TO FIVE"

COUNT ONE

AS OF DATES OCT. 3, 10, 25, 31, NOV. 3, 10, 16, 24-14"  
 ATT. RANDY MASTRO, ESQ., HIS CLIENT N.J. GOV.  
 CHRIS CHRISTIE, ESQ., N.J. S.D.A. ALLY. CEO CHARLES  
 B. McKENNA, AND N.J. TRENTON Bd. OF EDUCATION  
 did committed several civil tort acts of..  
 HURT DISCRIMINATION BREACH OF CONTRACTS  
 F.T.C., AND N.J. CONTRACT BIDDING VIOLATIONS  
 BY FAILING TO ACCEPT, HONOR, AND EXECUTE  
 MY CONSTITUTIONAL DUE PROCESS, TO WAIVE...  
 CONTRACT BIDDING PROCESS, THAT DOESNT...  
 APPLY TO ME, MR. CLINTON C. BARLOW, II (NO)  
 BECAUSE I AM DOING JUNK COLLECTION IN (N.J.)  
 TRENTON CENTRAL HIGH SCHOOL FOR FREE."

"COUNT TWO"

UNDER N.J. CASE OF CARNEY, INC. V. CITY OF...  
 TRENTON, 562 A.2d 807 N.J. SUPER. CT. APP. DIV...  
 1988), PRECEDENTIAL STATE APP. CASE, CITED  
 AS 562 A.2d 807, 235 N.J. SUPER. 372, AND  
 N.J. STATE CONTRACT BIDDING LAWS, N.J.S.A.  
 A-40A:11-1 ET. SEQ. BIDDING DOESNT APPLY TO  
 ME, BECAUSE I AM COLLECTING JUNK FOR...  
 FREE TO GIVE HALF OF JUNK PROFITS TO A  
 T.C.H.S. SCHOOL PROGRAM, AND SCHOOL AND  
 JUNK IS OWNED BY N.J. TAXPAYERS;"  
 42 U.S.C. SECTION 1983, COLOR OF (STATE) LAW,  
 MONROE V. PAPER, 365 U.S. 167, 187, (1961) SEC. 1983;



"COUNT THREE"

"AS OF SAME DATED, STATE DEFENDANTS... ARE REPEATEDLY FAILING TO RESPOND BACK TO ME, AND FAILING TO MEDIATE CASE." THE ONLY N.J. STATE AGENCY WHO TRIED TO ADOPTED DISPUTE CASE WAS THE N.J. STATE DEPT. OF COMMUNITY AFFAIRS, Bldg. Code inspection," BUT, N.J.S.D.A. CEO, AND TRENTON Bd. OF EDUCATION ARE... FAILING TO REPLY, RESPOND, AND ANSWER MY DISPUTED CLAIMS, OF CIVIL TORTS." STATE IS VIOLATING MY DUE PROCESS."

"COUNT FOUR"

"IN SUPPORT OF MY SEVERAL WRIT OF PETITIONS THAT WAS ADDRESSED TO GOVERNOR'S ATTY. ... N.J. GOVERNOR CHRISTIE, N.J. CEO OF THE N.J. SCHOOL DEVELOPMENT AUTHORITY CHARLES B. MCKENNA, AND TRENTON MAYOR ERIC JACKSON, % TRENTON SCHOOL BOARD SUPERINTENDENT AND BOARD MEMBERS," I AM FILING A U.S. FEDERAL MOTION BEFORE THE U.S. JUDGE TO FORCE THEM TO RESPOND BACK TO ME, AND MAKE ME AN OFFER OF SETTLEMENT," BEFORE WE ATTEND A N.J. STATE COURT TRIAL, OR A N.J. STATE ADMIN. LAW HEARING," AS WELL AS A HEARING BEFORE THE N.J. STATE COURT APPELLATE DIV. COURT."

"I AM ASKING FOR THE SAME NO BID CONTRACT, LIKE N.J. GOVERNOR CHRISTIE'S FRIENDS OF.... HAMMERMAN & GAINER, INC. AND H.G.I. DID... RECEIVED A TOTAL AMOUNT OF \$ 780 MILLION... BUT I KNOW THAT, THAT'S NOT THAT MUCH... PROFIT IN JUNKING RECYCLES."

BUT IF N.J. GOVERNOR CHRISTIE DID... GAVE HIS CRONIES, FRIENDS THAT MUCH... MONEY IN RETURN FOR THEIR DONATION TO THE B.G.A., I DEEPLY FEEL THAT MR. N.J. GOVERNOR AND N.J. S.D.A. C.E.O. CHARLES B. MCKENNA, CAN ADMINISTRATIVELY AND EXECUTIVELY GRANT... MR. MR. BARLOW, III, A NON-BIDDING WAIVER... "SO THAT I CAN RETRIEVE AND COLLECT OLD FUNDS FROM T.C.H.S. BEFORE DEMOS BIDDING STARTS... IN THE SPRING OF 2015 AT T.C.H.S."

"AND IF WE CAN WORK THIS PROBLEM OUT... BEFORE THAT TIME, WE WON'T HAVE NO... MORE LEGAL DISPUTES, THAT I CAN... PROMISE YOU BEFORE COURT OF LAW."

BECAUSE I DON'T LIKE GOING TO STATE OR... FEDERAL COURTS 'ALL THE TIME BUT IF I... NEED TO PROTECT MY CIVIL RIGHTS... EQUAL RIGHTS AND THE PROCESS OF LAW, "I WILL GO RIGHT TO FED. COURT."

COUNT SIX

"PURSUANT TO CARNEY, INC. V. CITY OF TRENTON,  
562 A.2d 807, N.J. Super. Ct. App. Div. 1988,  
CITED AS: 562 A.2d 807, 235, N.J. Super. 372,  
Temp. INJUNCTION AGAINST ENFORCEMENT OF.  
(N.J.) STATE STATUTE, BIDDING CONTRACTS...  
TO BE HEARD BEFORE A THREE PANEL JUDGES."

COUNT SEVEN

"N.J. T.B.E. Employee NAMED GEORGETTE BAUMAN  
FALSELY STATED TO ME, THAT THE SEVERAL NOTICES  
OF ADMIN. AND N.J. COURT APPEALS NOTICES...  
WERE NOTICES OF HARASSMENTS TO ME AND  
HER STAFFS, THAT'S A TORTIOUS STATEMENT  
THAT SHE MADE AGAINST ME" THAT'S WHY  
I PLAN TO SUE HER AND SCHOOL BOARD."

COUNT EIGHT

"N.J. TRENTON Bd. OF EDUC. INC., City of Trenton  
Atty. AND N.J. STATE Schools Development...  
Authority CEO, INC. IS ALL FAILING TO ACCEPT  
FILE AND PROCESS MY EMERGENCY MOTION  
OF REQUESTS TO GRANT A NON BIDDING DEMO.  
CONTRACT, BECAUSE BIDDING DOESN'T APPLY TO ME"  
BECAUSE ALL THAT I AM TRYING TO DO IS TO...  
ENTER INTO OLD SCHOOL TO RETRIEVE AND TO  
COLLECT STICK UNITS FROM T.C.H.S. SCHOOL  
BEFORE IT GOES OUT FOR BIDDING IN SPRING 2015."

"Due to Several Conflict with U.S.D.C. OF N.J. Federal Court, Mel Jackson," Especially, "And That The Main Head Atty. Party, Attorney MR. RANDY MASTRO, ESQ, Lives And Resides in STATE OF New York, I do.. Choose to File U.S. Federal Civil Action in Brooklyn, N.Y. Federal Court, of Law, yes where I can Get Equal Treatment. And Fair Due Process of Fed. Law!"

"I did Served All Parties A Copy of.. This Fed. Civil (TORT) Civil Action, yes, ON DATE OF NOV. 24, 2014" By Fed. Law,"

"And This Federal Civil Action injunction is to Support, My Temp. STATE Civil Action, That I have still Pending Against The Named N.J. STATE And City of Trenton INC, Corp. Government employees who are still Hud Discriminating Against.. me, Mr. BARLOW, JR. By Failing to... Accept, Honor And Process my WAIVER OF REQUEST to WAIVE BIDDING PROCESS." Because STATE School Bidding doesn't Apply to me," Because I Am doing... And Collecting Reimbursable School Junk, For Free," Before Demo Bidding Starts in Commine Spring of 2014," The STATE And City of Trenton, And Trenton Bd. OF Education is Hud Discriminating Still."



NOV. 24, 2014  
EMERGENT WRIT

ATTN:

HON. PETER TOMKA, Pres. Judge, I.C.J., U.N. ...  
 INT'L. WORLD COURT OF JUSTICE, Peace Palace, CARP.  
 Plein 2, 2517 K-J, The Hague The Netherlands,

ATTN:

HON. CHF. JUSTICE JOHN. G. ROBERTS, JR, U.S.S.C.,  
 OFC. OF THE CLERK, WASH, D.C. 20544;

ATTN:

HON. CHF. JUDGE CAROL B. AMON, CHF. JUDGE OF.  
 U.S.D.C.E.D. OF N.Y., OFC. OF THE CLERK, 225 CADMAN  
 PLAZA E., BROOKLYN, N.Y., N.Y. 11201

ATTN:

HON. CHF. JUDGE TIMOTHY C. STANCEU, CHF. JUDGE OF  
 UNITED STATES COURT OF INT'L. TRADE....  
 1 FEDERAL PLAZA, N.Y., N.Y. 10278-0001

DIRE: MR. CLINTON C. BARLOW, III, PRO SE,  
 P.O. Box 2134, TRENTON, N.J. 08607, PLAINTIFF.

V.

N.Y. ATTY. RANDY MASTRO, CHRIS CHRISTIE, ESQ.  
 CHARLES B. MCKENNA, TRENTON MAYOR E. JACKSON  
 MANNY DA SILVA, GEORGETTE BOWMAN, DR. FRANCIS  
 RUDAN, City of Trenton, Trenton School Bd...,  
 AND STATE OF NEW JERSEY, ETAL'S .....

DEFENDANT'S

COVER  
PAGE  
A-1

May 24, 2014  
EMERGENT PETITION

ATTN:

THE HON. CH. JUDGE CAROL B. AMON, U.S.D.J.,  
U. S. DISTRICT COURT, E. DIST. OF N.Y.,  
225 CADMAN PLAZA EAST, BROOKLYN, N.Y.,  
11201,

ASSIGN FED. CASE to A TRIAL JUDGE AND A U.S. FED.  
JUDGE: MAGISTRATE JUDGE, YOUR HONOR!

MR. CLINTON C. BARLOW, III V. ATTY. RANDY MASTRO,  
CHRIS CHRISTIE, CHARLES B. MCKENNA, N.J. S.P.A.  
TRENTON MAYOR ERIC JACKSON, N.J. TRENTON BOARD OF...  
EDUCATION, IN V. ATTY. RANDY MASTRO, ESQ. ETAL'S

DEAR HON. CH. JUDGE C.B. AMON, U.S.D.C. CH. J.,  
MADAM:

PURSUANT TO FED. R. CIV. PROC. AND SEC. § 2283,  
2 [4], VENDO CO. V. LERTRO-VERD CORP. 433 U.S. 683,  
97 S. Ct. 2881, I, MR. CLINTON C. BARLOW, IS NOW...  
FILING AN EMERGENT STAY IN AID OF N.J. STATE...  
COURT'S JURISDICTION 17 MOORE'S FED. PRACTICE...  
§ 121.07, TO ENFORCE TEMP. STAY OF INJUNCTION...  
AGAINST BOTH N.J. TRENTON Bd. OF EDUCATION...  
AND N.J. SCHOOL Development Authority CEO...  
TO STOP DEMOLISHING CONSTRUCTION SETBACK...  
IN SPRING OF 2015, UNTIL I CAN ENTER INTO  
T.C.H.S. TO RETRIEVE AND COLLECT ALL OF...  
SCHOOLS RECYCLED JUNK, "BY N.J. STATE LAW,"



STATE OF NEW JERSEY

# SCHOOLS DEVELOPMENT AUTHORITY

32 EAST FRONT STREET

P.O. BOX 991

TRENTON, NJ 08625-0991

609-858-5395

November 10, 2014

Mr. Clinton C. Barlow, III  
P.O. Box 2134  
Trenton, NJ 08507

Dear Mr. Barlow:

Thank you for your letter dated November 6, 2014. Please know that the NJ Schools Development Authority will hire through a public and competitive process, a General Contractor for the demolition and remediation of Trenton Central High School. The General Contractor will be responsible for all remediation and demolition activities including possible salvage of recyclable materials. This contract is anticipated for award in the spring of 2015. At the time of award, the contact information of the winning bidder will be placed on our website at that time. I recommend that you check the website periodically should you wish to market your services directly with the winning bidder. In the interim, please know that you do not have permission by the NJSDA to enter the property for any reason. Should you be interested in receiving emails that notify the public of when upcoming advertisements are posted, please sign up for our mailing list at <http://www.njsda.gov/CU/JoinOurMailingList.asp>.

If you have any questions or would like further information, please do not hesitate to contact our office.

Sincerely,

A handwritten signature in black ink, appearing to read "Kristen MacLean".

Kristen MacLean  
Director - Communications

cc: Manny DaSilva



State of New Jersey

DEPARTMENT OF COMMUNITY AFFAIRS

101 SOUTH BROAD STREET

PO Box 818

TRENTON, NJ 08625-0818

CHRIS CHRISTIE  
*Governor*

KIM GUADAGNO  
*Lt. Governor*

RICHARD E. CONSTABLE, III  
*Commissioner*

November 4, 2014

Mr. Clinton L. Barlow, III  
Post Office Box 2134  
Trenton, New Jersey 08607

Re: Trenton High School  
Collection of Recyclables

Dear Mr. Barlow:

This is in response to your letter concerning the above referenced matter. You are advised that although the Schools Development Authority is demolishing the property, the property is still owned by the City of Trenton. Accordingly, the issue of access must be taken up with the City as the Division of Codes and Standards and the Schools Development Authority have no jurisdiction over property maintenance/pre-demolition issues.

I hope this information is helpful to you. If you have any questions concerning the above, please do not hesitate to contact me at (609) 984-7672.

Very truly yours,

A handwritten signature in black ink, appearing to read "Robert S. Hilzer".

Robert S. Hilzer  
Office of Regulatory Affairs

cc: Louis J. Mraw







**State of New Jersey**  
DEPARTMENT OF COMMUNITY AFFAIRS  
101 SOUTH BROAD STREET  
PO Box 818  
TRENTON, NJ 08625-0818

CHRIS CHRISTIE  
*Governor*

KIM GUADAGNO  
*Lt. Governor*

RICHARD E. CONSTABLE, III  
*Commissioner*

November 10, 2014

Mr. Clinton L. Barlow, III  
Post Office Box 2134  
Trenton, New Jersey 08607

Re: Trenton High School  
Collection of Recyclables

Dear Mr. Barlow:

This is in response to your letter and documents concerning the above referenced matter. As previously indicated to you in my letter last week, the Office of Regulatory Affairs has no jurisdiction over your access to the Trenton Central High School demolition site. You must take this issue up with the City of Trenton as I again indicated in my previous letter.

I hope this information is helpful to you. If you have any questions concerning the above, please do not hesitate to contact me at (609) 984-7672.

Very truly yours,

A handwritten signature in black ink that reads "Robert S. Hilzer".

Robert S. Hilzer  
Office of Regulatory Affairs

cc: Louis J. Mraw





# State of New Jersey

DEPARTMENT OF EDUCATION  
PO Box 500  
TRENTON, NJ 08625-0500

CHRIS CHRISTIE  
Governor

KIM GUADAGNO  
Lt. Governor

DAVID C. HESPE  
Acting Commissioner

November 18, 2014

**PETITIONER/ATTORNEY**

Clinton Barlow, III, *Pro Se*  
P.O. Box 2134  
Trenton, NJ 08607

**RESPONDENT/ATTORNEY**

Board Secretary  
Trenton Board of Education  
108 North Clinton Avenue  
Trenton, NJ 08609-1014

Dear Parties:

CLINTON BARLOW, III V. BOARD OF EDUCATION OF THE CITY OF TRENTON, MERCER COUNTY

Agency Dkt. No.: 331-11/14 Document filed by: XX Petitioner \_\_\_\_\_ Respondent

This will acknowledge receipt of the following document(s) filed with the Commissioner on November 17, 2014 in the above-captioned matter:

XX Petition of Appeal

*N.J.A.C. 6A:3-1.5*, requires respondent within 20 days from receipt of Petition to file an Answer with proof of service upon petitioner.

XX Documents submitted with phone number.

XX Proof of Service

XX Verification or Certification

\_\_\_\_\_ Residency Appeal -- SEE BOX AT RIGHT

\_\_\_\_\_ Answer -- Transmitting to OAL

\_\_\_\_\_ Motion for Emergent Relief

\_\_\_\_\_ Other \_\_\_\_\_

## RESIDENCY APPEALS ONLY

Where a petition of appeal is filed pursuant to *N.J.S.A. 18A:38-1* (residency dispute), no child shall be denied admission to the district during the pendency of proceedings. However, if in the judgment of the Commissioner the evidence does not support the claim of the petitioner, the Commissioner shall assess the petitioner tuition for the student prorated to the time of the student's ineligible attendance in the schools of the district. Orders assessing tuition are enforceable in Superior Court.

Pursuant to *N.J.A.C. 6A:3-8.1*, *pro se* petitioners may effect service through the Bureau of Controversies and Disputes. Upon receipt of any *pro se* residency appeal which has not been served on the Board, the Bureau will transmit to the Board, together with this acknowledgement, a copy of the letter petition via fax, whereupon the Board is considered served for purposes of obligation to answer the petition and effectuate the child(ren)'s attendance.

A REVIEW OF THE PLEADINGS REVEALS THE FOLLOWING INFORMATION HAS NOT BEEN PROVIDED. PLEASE NOTE AND FILE WITH THIS OFFICE:

\_\_\_\_\_ No proof of service included (*N.J.A.C. 6A:3-1.3*).

\_\_\_\_\_ No notarized verification (*N.J.A.C. 6A:3-1.4(a)*).

\_\_\_\_\_ Other: \_\_\_\_\_

**THIS MATTER MAY NOT MOVE FORWARD IF ABOVE-SPECIFIED DEFICIENCIES REMAIN UNADDRESSED.** If you have any questions, please contact this office at (609) 292-5706.

**PLEASE NOTE:** SUBMISSIONS MAY BE MADE BY FAX ONLY WITH THE PRIOR CONSENT OF THE DIRECTOR and only under extraordinary circumstances where over ten (10) pages. Please contact the Bureau at (609) 292-5706 to obtain permission prior to faxing documents.

M. Kathleen Duncan, Director  
Bureau of Controversies and Disputes

MKD/JKH/kk:o/acknowl pet/cbarlow

www.nj.gov/education

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FILED

NOV 19 2014



*Mark Heary*  
CLERK

Supreme Court of New Jersey

Single-Justice Disposition on Application for Emergent Relief (Rule 2:9-8)

Case title: Clinton C. Barlow, III v. Trenton Board of Education

Supreme Court  
docket number: S-26-14 (075231)

Appellate Division  
docket number (if available):

Applicant's name: Clinton C. Barlow, III

The applicant's request for permission to file an emergent motion and any related request for a temporary stay or other relief pending disposition of an emergent motion are **DENIED** for the following reason(s):

- ☒ 1. The matter does not concern a genuine emergency or otherwise does not warrant adjudication on short notice. The applicant may file a regular motion for review by the Superior Court, Appellate Division in the ordinary course.
- ☐ 2. The Appellate Division has entered an order or judgment, and the matter is not emergent or otherwise does not warrant adjudication on short notice. The applicant may file a regular motion for review by the Supreme Court in the ordinary course.
- ☐ 3. The application concerns an order entered during or on the eve of trial as to which there is no prima facie showing that immediate interlocutory intervention is required. The applicant may file a regular motion in the appropriate court for review in the ordinary course.
- ☐ 4. The applicant must obtain a signed order or disposition from the Appellate Division before requesting relief from the Supreme Court.
- ☐ 5. Other:

Date: 11/19/2014

By: *Justice Lee A. Solomon*

Name: Justice Lee A. Solomon

The foregoing is a true copy  
of the original on file in my office.

*Mark Heary*

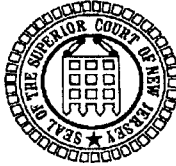
CLERK OF THE SUPREME COURT  
OF NEW JERSEY

SUPERIOR COURT OF NEW JERSEY  
APPELLATE DIVISION

JOSEPH H. ORLANDO  
CLERK

JOHN K. GRANT  
DEPUTY CLERK

JACK G. TRUBENBACH  
CHIEF COUNSEL



RICHARD J. HUGHES JUSTICE  
COMPLEX  
P.O. BOX 006  
TRENTON, NEW JERSEY 08625-0006  
(609) 292-4822

Date: November 19, 2014

CLINTON C BARLOW  
PO BOX (2134)  
TRENTON, NJ 08607

Re: CLINTON C. BARLOW, III V. TRENTON BOARD OF EDUCATION, NEW JERSEY  
SCHOOL DEVELOPMENT AUTHORITY

Dear Clinton C Barlow,

We are returning herein, unfiled, your Notice of Motion for Leave to Appeal in the above matter due to the following:

- ☒ Failure to submit a Brief and Appendix in support of the Motion for Leave to Appeal as required by R. 2:5-6 and 2:8-1. Please note that the Order/Decision you are appealing must be included in your Appendix.
- ☒ The format of your Brief must comply with R. 2:6-10, which provides that each page shall contain no more than 26 double-spaced lines of no more than 65 characters, including spaces, and a type of no less than 10-pitch or 12-point. Please
- ☒ Failure to submit the \$50.00 filing fee or a Notice of Motion to Proceed as an Indigent. The motion must be supported by a Certification explaining why you feel you are entitled to the relief requested.
- ☒ Other: When filing a Motion for Leave to Appeal an interlocutory matter a Notice of Appeal is NOT required, and should not be filed unless the Motion for Leave is granted. Please do not resend the Notice of Appeal when you are filing the Motion for Leave to Appeal.

*PLEASE NOTE THAT MY CORRECT ADDRESS IS . . . .  
P.O. BOX 2134, TRENTON, N.J. 08607,  
SEEKING AN EMERGENCY STAY OF AGENCY ORDER."*



If the deficiencies noted above are corrected and the original Notice of Motion for Leave to Appeal resubmitted within 10 days, the motion will be filed as of the original received date. Please return the copy of this notice with the motion to facilitate handling and serve a copy on all parties.

JOSEPH H. ORLANDO  
CLERK

/mpw

Enclosure: Motion for Leave to Appeal Kit  
cc: Department of Education  
Attorney General-Civil  
ADMIN-07

"PLEASE GRANT me UNTIL Dec. 4, 2014...  
TO PREPARE AND submit my LEGAL BRIEF...  
THAT ONLY CAN BE WRITTEN IN HAND WRITTEN  
SO THAT I MAY ADDRESS THE APP. DIV. COURT  
AND I do PLAN TO FILE LEAVE TO APPEAL...  
BECAUSE Lower Court is NOT Fully done"  
"AND I did served ALL PARTIES By U.S. MAIL"

Thank you"  
Clinton C. Barlow, III  
Mr. Clinton C. Barlow, III  
P.O. Box 2134, Trenton,  
N.J. 08607

cc/ N.J. STATE ATT. GENERAL'S OFF.,  
N.J. STATE School Development Authority  
N.J. TRENTON BOARD OF EDUCATION INC.

SUPERIOR COURT OF NEW JERSEY  
APPELLATE DIVISION  
DOCKET NO. (2)

(1)

MR. CLINTON C. BARLOW, III  
P.O. BOX 2134, TRENTON, N.J.  
08607

"MOTION FOR LEAVE TO APPEAL,  
GRANT INDIGENCY AND TO TEMP. STAY  
OF T.B.E. AND N.J.S.D.A. ORDERS.  
MORE TIME TO PREPARE BRIEFS. AND  
WAIVE N.J. AGENCY'S ORDER.  
STATE IS VIOLATING MY DUE PROCESS!"

(3)

CLINTON C. BARLOW, III  
TRENTON Bd. OF EDUCATION  
N.J. School Development Authority  
ETALS

NOTICE OF MOTION FOR (4) FOR LEAVE  
TO APPEAL AND TO STAY T.B.E. AND  
N.J.S.D.A. TO WAIVE BIDDING PROCESS  
BECAUSE I AM COLLECTING JUNK  
FOR FREE, DOESN'T COST N.J. TAX  
PAYERS, A dime; MOTION TO...  
SET FORTH A MEDIATION HEARING  
STATE IS FAILING TO WAIVE MY  
CONTRACT BIDDING PROCESS  
BECAUSE MY WORK IS FOR FREE!"

TO: (5) TRENTON Bd. OF EDUC.,  
N.J. School Devlp. Authority  
N.J. T.B.E. ATTORNEY...  
N.J. STATE GOVERNOR CHRISTIE,

PLEASE TAKE NOTICE that the undersigned hereby moves before the  
Superior Court of New Jersey, Appellate Division, for an Order (6)  
"TO TEMP. STAY N.J. AGENCY DENIENG me A WAIVER OF BIDDING,"  
TO RETRIEVE AND COLLECT JUNK FROM T.C.H.S. BEFORE ITS DEMO IN SPRING 2015

In support of this motion, I shall rely on the accompanying brief. (7)

(8) NOV. 24, 2014  
(Date)

(9) Clinton C. Barlow, III  
(Signature)

(10) CLINTON C. BARLOW, III

I hereby certify that I am mailing or delivering the original and four copies  
of this notice of motion and accompanying brief to the Clerk of the Appellate  
Division and mailing or delivering two copies of same to the following:

(11) TRENTON Bd. OF EDUCATION  
N.J. School Development Authority  
N.J. City of TRENTON ATTORNEY  
N.J. STATE ATTY. GENERAL,

(12) NOV. 24, 2014  
(Date)

(13) Clinton C. Barlow, III  
(Signature)

(14) CLINTON C. BARLOW, III

ADMIN-39

3/96

Revised 11/17/2014, CN 10837-English (Appellate Pro Se Kit)

page 25 of 26

"I'M ASKING FOR MORE TIME TO PREPARE LEGAL BRIEF!"

PLEASE PRINT OR TYPE ALL INFORMATION

- (1) Name CLINTON C. BARLOW, III Phone # 609-373-9202  
 Address P.O. BOX 2134 # TRENTON, N.J. 08607  
 Date of Birth 3-27-63 Number of Dependents 1

**EMPLOYMENT**

- (2) Employed By (NONE)  
 Position Ø Monthly Salary \$ Ø

**ASSETS** (Attach additional sheets if necessary)

- (3) Other Income (Source and Monthly Amount) Ø  
 (4) Checking/Savings Accounts (Name of Banking Institution and Present Balance) NONE  
N/A  
 (5) Real Estate (Address, Present Value and Equity) NONE  
N/A  
 (6) Personal Property (Item and Present Value) NONE  
 (7) Auto/Truck/Motorcycle (Year, Make and Present Equity) (Old Ford mercury 1996)  
 (8) Other Assets (Type and Present Value) NONE — N/A

**LIABILITIES** (Attach additional sheets if necessary)

- (9) Mortgage/Rent/Halfway House Payment Per Month \$ 500.<sup>00</sup> Mortgage Balance \$ Ø  
 (10) Outstanding Loans (Nature and Present Balance) Filed Chpt. 7 BANKR.  
 (11) Credit Cards (Name and Present Balance) Filed Chpt. 7 BANKR.  
 (12) Other Liabilities (Type and Present Amount) Filed Chpt. 7 BANKR.

- (13) SET FORTH ANY OTHER RELEVANT INFORMATION CONCERNING YOUR FINANCIAL CIRCUMSTANCES:

This NOX Bidding Hud DISCRIMINATION CASE MADE  
me SPEND MORE money that I CANT AFFORD;

**CERTIFICATION IN LIEU OF OATH (COURT RULE 1:4-4(b))**

I CERTIFY THAT THE FOREGOING STATEMENTS MADE BY ME ARE TRUE. I AM AWARE THAT IF ANY OF THE FOREGOING STATEMENTS MADE BY ME ARE WILLFULLY FALSE, I AM SUBJECT TO PUNISHMENT.

- (14) Signature Clinton C. Barlow, III Date: NOV. 24, 2014

11-24-14

ATTN:

MR. RANDY MASTRO, ESQ.  
ATTY. FOR GOVERNOR CHRISTIE'S  
GEORGE WASH. S BRIDGE PROBE,  
N.Y. LAW OFF. OF GIBSON RUMIN,  
200 PARK AVE., N.Y., N.Y. 10166

Fax.

609-292-3454  
N.J. GOVERNOR'S FAX NO.

IN RE: I, CLINTON C. BARLOW, III, A N.J. CONTRACTOR, ...  
PLAN TO SUE YOU AND GOVERNOR CHRISTIE, EXFMR. 212. ATTY.  
AND S.D.A. CEO EXFMR. ASST. U.S. ATTY. CHARLES B. MCKENNA,  
IN THE U.S. DISTRICT COURT, FOR FAILING TO RESPOND  
BACK TO ME, MR. BARLOW, III, TO ENTER INTO N.J. TRENTON  
CENTRAL HIGH SCHOOL TO RETRIEVE AND COLLECT OLD JUNK,  
THAT'S OWED BY THE TAXPAYERS OF NEW JERSEY."  
LAST WEEK, N.J. D.C.A. HAS ADVISED ME THAT, "BUT THE  
PROPERTY BLDG IS STILL OWNED BY THE CITY OF TRENTON,"  
BUT MR. C.E.O. CHARLES B. MCKENNA IS STILL REFUSING,  
AND DISREGARDING, MY REQUEST TO GET INTO SCHOOL WAY..  
BEFORE ITS DEMO. BIDDING PROCESS STARTS IN SPRING, 2015.  
BECAUSE CONTRACT BIDDING DOESN'T APPLY TO ME, NO..  
I AM COLLECTING JUNK FOR FREE," THAT'S ALL I WANT, AND  
TO DONATE PART OF MONEYS TO T.C.H.S. PROGRAM."

P.S. I, NEED AN URGENT APPLY, BECAUSE YOU ARE THE...  
N.J. GOVERNOR CHRISTIE'S PRIVATE LAW ATTORNEY."

Clinton C. Barlow, III  
MR. CLINTON C. BARLOW, III  
P.O. BOX 2134, TRENTON, N.J.  
08607

- 1. THE HON. GOVERNOR CHRISTIE,
- 1. HON. N.J. D.C.A. COMM'R. R.E. CONNOTABLE,
- 1. HON. N.J. S.D.A. CEO CHARLES B. MCKENNA,
- 1. HON. N.J. STATE ATTY. GEN. JOHN HOFFMAN.



NOV. 24, 2014  
FAX NO 609-292-3454

ATTN:

THE HON. CHRIS J. CHRISTIE, ESQ.  
N.J. STATE EXEC. GOVERNOR'S OFFICE,  
STATE HOUSE, P.O. BOX 001,  
125 W. STATE STREET, TRENTON, N.J. 08625-0001

THRE: I, CLINTON C. BARLOW, III, N.J.H.I.C.,  
PLANNING TO ENTER INTO T.C.H.S. BLDG, BEFORE  
IT'S CONDEMNED BY SPRING OF 2015, "SO THAT  
I CAN DONATE PART OF MONEYS FROM JUNK TO  
A T.C.H.S. SCHOOL PROGRAM FOR FREE, BUT "I"  
DEEPLY FEEL THAT I AM BEING DISREGARDED  
BY YOUR N.J. S.D.A. CEO CHARLES B. MCKENNA,  
WHO'S ALSO AN EX-TR. 21. S. ALLIANCE FOR U.S.D.O.J.  
WHAT RECYCLABLE JUNK THAT I PLAN TO COLLECT,  
DOESN'T COST YOU, MR. GOVERNOR, OR S.D.A. OR  
BECAUSE I DID THE SAME PROJECT BEFORE IN  
ELWING TWP. N.J. "JUST CHECK WITH ATTORNEY.  
ROCKY L. PETERSON, WHO'S ELWING TWP. CORP. ATTY."  
PLEASE GET ME INTO COLLECT JUNK, MR. GOVERNOR,  
THANKS ALL I WANT IS THE JUNK."

PLEASE RESPOND AND  
THANK YOU.  
CLINTON C. BARLOW, III  
CLINTON C. BARLOW, III  
P.O. BOX 2134  
TRENTON N.J. 08607

11 NOV 29 2014  
NEED ENGINEER'S REPORT

ATTN:

THE HON. CHRIS J. CHRISTIE, N.J. STATE GOVERNOR,  
 HON. RICHARD E. CONSTABLE, III, N.J. STATE D.C.A., AND  
 HON. EDWARD M. SMITH, N.J. STATE D.C.A., DIV. OF CODES AND  
 STANDARDS, 101 S. BROAD STREET, P.O. BOX 802  
 TRENTON, N.J. 08625-0802

- \* NEED A COPY OF T.C.H.S. (ENHANCED) ENGINEER'S REPORT
- : IN RE: I, MR. CLINTON C. BARLOW, III,
  - : IS PLANNING TO ENTER INTO (T.C.H.S.)
  - : TRENTON CENTRAL HIGH SCHOOL BEFORE
  - : ITS TO BE DEMO. IN SPRING, 2014"
  - : BUT I PLAN TO RETRIEVE AND COLLECT
  - : ALL RECYCLABLES JUNK FROM EMPTY SCHOOL,
  - : BUT BOTH TRENTON SCHOOL BOARD...
  - : ENGINEER INSPECTOR AND N.J. S.D.A., IS
  - : FAILING TO GIVE ME COPY OF ENGINEER'S
  - : INSPECTION'S REPORT TO SEE WHAT PART
  - : OF BLDG IS SAFE TO ENTER TO COLLECT
  - : AND RETRIEVE MY SCHOOL'S JUNK."
  - : PLEASE URGENT RESPOND TO MY REQUESTS."

VERY TRULY YOURS,

Clinton C. Barlow, IIIMR. CLINTON C. BARLOW, III  
P.O. BOX 2134, TRENTON, N.J. 08607

CC; ATTY'S ATTORNEY RANDY MASTRO, ESQ.

ROBERT S. HILZER, ESQ. D.C.A.

LOUIS J. MAW, D.C.A.

JOHN HOFFMAN, N.J. STATE ATTY. GENERAL,

CHARLES B. MCKENNA, N.J. S.D.A. CEO

ATTN:

THE HON. N.J. GOVERNOR CHRIS CHRISTIE, ESQ.  
AND THE HON. N.J. TRENTON CITY MAYOR ERIC JACKSON,  
CITY HALL, CITY OF TRENTON, 319 E. STATE STREET.....,  
TRENTON, N.J. 08608;

IN RE: I, MR. CLINTON C. BARLOW, III A N.J. CONTRACTOR IN  
PLANNING TO ENTER INTO TRENTON CENTRAL HIGH SCHOOL, TO  
RETRIEVE AND COLLECT ALL OLD JUNK RECYCLABLES. BEFORE,  
A BIDDING CONTRACTOR CONSTRUCTION RECEIVES BIDD...  
TO DEMOLISH T.C.H.S. BLDG IN SPRING OF 2015!"  
MR. MAYOR ERIC JACKSON, ALL THAT I WANT TO DO IS...  
RETRIEVE AND COLLECT OLD JUNK, SO THAT I CAN THEN...  
DONATE PART OF MONIES TO A T.C.H.S. SCHOOL PROGRAM."  
IT IS OWNED BY TAXPAYERS AND TRENTON SCHOOL BOARD."  
I'VE SHOULDN'T HAVE TO SUE, CITY OF TRENTON SCHOOL BOARD  
N.J. SCHOOL DEVELOPMENT AUTHORITY FOR OLD JUNK!"  
IT'S TIME THAT GOVERNMENT CORPS THAT STOP UNJUSTLY.  
HUR DISCRIMINATING AGAINST TRENTON CITY BLACKS!"  
THAT'S WHY I AM GETTING U.S. HUR INVOLVE TO REVIEW  
AND INVESTIGATE WHY BLACKS ARE BEING VIOLATED.  
MR. MAYOR JACKSON, SIR CAN I HAVE YOUR COMMENT."

" TRULY YOURS "

x Clinton C. Barlow, III  
MR. CLINTON C. BARLOW, III  
P.O. BOX 2134, TRENTON,  
N.J. 08607

C. ENCLD.;  
C. HON. N.J. GOVERNOR CHRIS CHRISTIE,  
C. HON. N.J. MERCER COUNTY EXEC. B. HUGHES,  
C. HON. U.S. PRESIDENT B. OBAMA, W. H.,  
C. HON. N.J. D.C.A. C. D. R. ED. SMITH.  
C. HON. N.J. TRENTON SCHOOL SUPERINTENDENT

FAX NO. \_\_\_\_\_

ATTN:  
 THE HON. N.J. GOVERNOR CHRIS CHRISTIE,  
 THE HON. N.J. COUNTY EXEC. BRIAN M. HUGHES,  
 N.J. MERCER COUNTY MCRADE ADMIN.  
 640 S. BROAD STREET, TRENTON, N.J. 08650

IN RE: I, MR. CLINTON C. BARLOW, III, N.J. CONTRACTOR  
 IS PLANNING TO ENTER INTO T.C.H.S. BLDG, TO RETRIEVE,  
 AND COLLECT OLD JUNK RECYCABLES, BEFORE THE S.P.A.  
Bids Demo out to a Bidding CONTRACTOR, "IN SPRING OF 2014"  
 AND I, MR. BARLOW, III NEEDS TO KNOW FROM MERCER COUNTY  
EXECUTIVE, AND COUNTY COUNSEL ATTY. ART. SYPEK, JR.,  
"I WANT TO KNOW WHAT ROLE DOES MERCER COUNTY PLAY?"  
IN THE TRENTON CENTRAL HIGH SCHOOL DEMO. PROJECT?  
 MR. HUGHES, CAN YOU SIR, AND YOUR LEGAL COUNSEL...  
"LOOK INTO THIS MATTER FOR ME, MR. BARLOW, III"

"THANK YOU AND PLEASE...  
 RESPOND BACK TO ME, SINCE  
 x Clinton C. Barlow, III  
 MR. CLINTON C. BARLOW, III  
 P.O. BOX 2134, TRENTON, N.J.  
 08607

# ENCLD;

THE HON. N.J. GOVERNOR CHRIS CHRISTIE ESQ.  
 THE HON. N.J. TRENTON MAYOR ERIC JACKSON,  
 THE HON. U.S. PRESIDENT BARACK OBAMA, W. H., % U.S. HUP SECTY  
 THE HON. U.N. SECY GENERAL BAN KI-MOON, % U.N. WORLD COURT...  
 HON. N.J. STATE ATTY. GENERAL JOHN HOFFMAN, ESQ.  
 HON. N.J. MERCER COUNSEL COUNSEL ART. SYPEK, JR. ESQ.



ATTN:

N.J. STATE REALTOR COMMISSION  
50 W. STATE STREET, TRENTON, N.J. 08625

IN RE: I, MR. CLINTON C. BARLOW, III, A H.I.C.,  
CONTRACTOR, IS HEREBY FILING SEVERAL HUD...  
BLOCKBUSTERING, CIVIL RIGHTS COMPLAINTS...  
AGAINST... N.J. TRENTON SCHOOL BOARD OF EDUC.,  
AND INVOLVING... (N.J.) SCHOOL DEVELOPMENT AUTHORITY,  
COMMITTING BREACH OF CONTRACT, AND HUD DISCRIMINATION  
BY FAILING TO GRANT ME, MR. BARLOW, III, A WAIVER...  
TO ENTER INTO T.C.H.S. SCHOOL BLDG, TO COLLECT AND...  
RETRIEVE OLD JUNK FROM TRENTON ~~XXXXXXXXXX~~ CENTRAL HIGH  
SCHOOL, "BEFORE A BIDDING CONTRACT IS TO BE FILED  
AND PROCESS IN SPRING OF 2014," BUT STATE BIDDING  
DOESN'T APPLY TO ME UNDER LOCAL PUBLIC CONTRACTS  
LAW OF P.L. 1971, C. 198 C.40 A: 11-1 ET SEQ. CASE OF...  
AUTHORITY N.J. APP. DIV. COURT CASE OF CARNEY, INC. v.  
CITY OF TRENTON, 562 A. 2d 807 (N.J. SUPER. CT. APP. DIV. 1988).  
PLEASE URGENTLY LOOK INTO THIS HUD DISCRIMINATION."

x Clinton C. Barlow III  
MR. CLINTON C. BARLOW, III  
P.O. BOX 2134, TRENTON, N.J.,  
08607

CC/ ENCLD.  
U.S. HUD SECRETARY, WASH., D.C..  
N.J. STATE GOVERNOR'S OFFICE..  
N.J. STATE ATTY. GENERAL..  
N.J. STATE EDUCATION DEPT..  
N.J. TRENTON MAYOR'S OFFICE

ATTN:

THE HON. GOVERNOR CHRISTIE, ESQ.  
 INC/ HON. N.J. ATTY. GEN. JOHN HOFFMAN, ESQ.  
 STATE OF N.J., OFF. OF THE ATTY. GENERAL,  
DIV. OF LAW AND PUBLIC SAFETY, DIV. OF LAW.  
 H.J.C., 25 W. MARKET STREET,  
 TRENTON, N.J. 08625;

TITLE: I, MR. CLINTON C. BARLOW, III, A N.J. H.I.C.  
 CONTRACTOR, IS SEEKING PART PERMISSION CONSENT  
 FROM BOTH N.J. School Development Authority, CEO,  
 AND TRENTON SCHOOL BOARD OF EDUCATION, TO . . .  
 ENTER INTO TRENTON CENTRAL HIGH SCHOOL, TO COLLECT . . .  
 AND RETRIEVE OLD JUNK RECYCLABLES BEFORE SCHOOL IS  
 TO BE DEMOLISHED IN SPRING OF 2015, SO THAT I CAN  
 DONATE PART OF JUNK PROFITS TO A T.C.H.S. PROGRAM;  
 BUT THE N.J. S.D.A. CEO CHARLES B. MCKENNA, ESQ. AND  
 TRENTON SCHOOL BOARD IS HURD DISCRIMINATING AGAINST  
 ME, MR. BARLOW, III, TO ONLY COLLECT OLD JUNK THAT  
 PUBLIC CONTRACT BIDDING DOESN'T APPLY TO ME UNDER  
 N.J. APP. DIV. COURT CASE OF 562 A.2d 807, N.J. SUPER. CT.  
 APP. (1988), SCHOOL IS OWNED BY N.J. TAXPAYERS, NOT S.D.A.  
 PLEASE RESPOND TO ME ABOUT WHAT AUTHORITY DO STATE  
 HAS IN THIS PROJECT?

: "Truly yours,"

: Clinton C. Barlow, III

: MR. CLINTON C. BARLOW, III

: P.O. Box 2134, Trenton, N.J. 08607

C. ATTORNEY RANDY MASTRO, ESQ.  
 C. HON. N.J. GOVERNOR CHRIS CHRISTIE, ESQ.  
 C. HON. N.J. S.D.A. CEO CHARLES B. MCKENNA  
 C. HON. N.J. TRENTON MAYOR ERIC JACKSON,  
 C. N.J. OFF. OF TRENTON ATTORNEY AT LAW

140V.15, 0011

"NOTICE OF EMERGENT APPLICATIONS"

ATTN:

THE HON. CH. JUSTICE OR ASSOC. JUSTICE, N.J.S.S.C., OFC.  
OF CLERK, N.J. SUPREME COURT P.O. BOX 970, R.J.H.C.,  
25 MKT. ST., TRENTON, N.J. 08625

ATTN:

HONORABLE P. J.A.D. OR EMERGENT APP. DIV. JUDGE,  
APP. DIV. COURT, R.J.H.J.C., 25 MKT. STREET, ...  
TRENTON, N.J. 08625,

ATTN:

HONORABLE LAURA SANDERS, ACTING DIRECTOR AND ...  
CH. ADMIN. LAW JUDGE, N.J. STATE OFC. OF ADMIN. LAW,  
P.O. BOX 049, TRENTON, N.J. 08625-0049, AND ...  
N.J. STATE EDUC. DIR. B. C. D. DIR. K. DUNCAN ....

ATTN:

HONORABLE ANKLOWITZ, JUDGE, J.S.C., Mercer County ...  
SUPER. COURT, 175 S. BROAD ST., TRENTON, N.J. 08625

IN RE: C. BARLOW III V. TRENTON Bd. OF EDUC. ETAL'S

N. J. STATE SUPERIOR COURT ....  
APPELLATE DIVISION ....

DKT. NO. AM-

MOTION NO. M-

BEFORE: PART \_\_\_\_\_;

JUDGES \_\_\_\_\_,

1. THE MAIN PURPOSE OF A BRIEF IS TO...  
CLEARLY AND CONCISELY CONVINCE, THE  
STATE COURT, MY VIEWS ARE CORRECT,  
LOGICAL AND REASONABLE."
2. ONLY BRIEFS THAT MEET THE REQUIRED...  
CRITERIA ARE REVIEWED, DUE TO THE...  
HIGH VOLUME THE COURT RECEIVES
3. MY BRIEF WILL IDENTIFY THE ISSUES...  
AND PRESENT ALL FACTS, IN A SYSTEMATIC...  
MANNER. IT SHOULD BE RULED AND REVERSED  
IN MY FAVOR," BY N.J. STATE SUPREME COURT,  
AND/OR N.J. STATE APPELLATE DIV. COURT,
- 4) "MY APPELLATE BRIEF IS AN LEGAL WRIT...  
ARGUMENT THAT IS TO BE WRITTEN AND...  
PRESENTED TO THIS N.J. APPELLATE COURT, THE  
PURPOSE IS TO CONVINCE THE COURT...  
TO UPHOLD OR/AND REVERSE AN ORDER...  
OR JUDGEMENT MADE BY A LOWER COURT IN...  
ERROR THAT VIOLATED MY CONSTITUTIONAL  
RIGHTS OF UNITED STATES, AND NEW JERSEY  
PURDUANT TO 1789 JUDICIARY ACT OF CONG.  
AND 1965 FEDERAL CIVIL RIGHTS ACT, THAT  
WAS PASSED BY U.S. PRESIDENT JOHN F. KENNEDY...  
B/K/A DR. M. L. K., JR. FED. CIVIL RIGHTS...



STATE OF NEW JERSEY  
SUPREME COURT OF NEW JERSEY  
N.J. STATE APP. DIV. COURT  
N.J. STATE ADMIN. LAW (COURT) . . . .  
N.J. MERCER COUNTY SUPER. COURT. in 96  
N.J. STATE GOVERNOR EXECUTIVES APPEAL. . .

"C. BARLOW, III V. TRENTON Bd. OF EDUC."  
LEGAL BRIEF IN SUPPORT OF . . . .  
PROSE PLAINTIFF'S MOTION IS IN . . .  
AID OF LITIGANT'S CIVIL RIGHTS . . .  
CIVIL TORT, BREACH OF CONTRACT, AND . . .  
EQUAL PROTECTION OF FED. LAW;

"LEGAL TABLE OF CONTENTS PAGES."

- 1) CONSTRUCTION LIEN CLAIM . . . . Pp. 3
- 2) LEGAL MERITS TO SUPPORT CASE . . . Pp. 9
- 3) PRESENTATION OF ISSUES AND FACTS . . . Pp. 5
- 4) CITY OF TRENTON, CAP IS THE DEFENDANT Pp. 3, 5, 6
- 5) ARGUMENT . . . . . Pp. 8, 9
- 6) EMERGENT APPLICATION TO STAY WRIT, Pp. \_\_\_\_\_
- 7) 1st. SEEKING EMERGENT STAY BEFORE S.D.A. Pp. \_\_\_\_\_
- 8) NOTICE OF APPEAL TO MERCER COUNTY COURT Pp. \_\_\_\_\_
- 9) NOTICE OF APPEAL TO N.J. ADMIN. LAW, Pp. \_\_\_\_\_
- 10) 1965 FED. CIVIL RIGHTS ACT OF CONGRESS Pp. \_\_\_\_\_
- 11) NOTICE OF APPEAL TO ALL PARTIES . . . Pp. \_\_\_\_\_
- 12) CONCLUSION . . . . . Pp. \_\_\_\_\_



"EMERGENCY APPLICATION"

PLEASE TAKE SPECIAL NOTICES THAT, I, MR. CLINTON C. BARLOW, III IS FILING AN EMERGENCY APPLICATION TO STAY TWO N.J. STATE AGENCY'S... ORDERS THAT WERE BY, N.J. S.P.A. AND T.B.E., THAT DENIES MY CONSTITUTIONAL RIGHTS... DUE PROCESS AND EQUAL PROTECTION AND... RIGHT TO A FAIR HEARING."

"BUT N.J. STATE AGENCY'S HAD ERRORED... IN FAILING TO HONOR MY REQUEST, TO ENTER... INTO T.C.H.S. Bldg, TO RETRIEVE JUNK, YES, BECAUSE N.J. STATE BIDDING DID NOT APPLY TO ME, BECAUSE, I AM ONLY RETRIEVING JUNK, TOOL FREE, AM NOT CHARGING A FEE."

"I AM SEEKING AN EMERGENCY OF DENIAL, AND DENIAL OF MY REQUEST TO REMOVE... JUNK RECYCLABLES FROM T.C.H.S. Bldg... BEFORE ITS DEMOLISHED BY A BIDDING... CONSTRUCTION INC., AND BOTH AGENCY'S... ARE HYD DISCRIMINATING AGAINST... TRENTON CITY BLACK RESIDENTS."

"I AM SEEKING AN EMERGENCY... STAY OF DENIED REQUEST BY BOTH N.J. S.P.A. AND TRENTON Bd. OF EDUC."

Pp. —

CONSTRUCTION LIEN CLAIM...

UNTIL I AM RIGHTFULLY GAIN ACCESS...  
 AND PERMITTED PERMISSION TO ENTER...  
 INTO T.C.H.S. SCHOOL BLDG. TO COLLECT...  
 AND RETRIEVE OLD JUNK RECEIVABLES .....  
 PURSUANT TO CONSTRUCTION LIEN LAW....  
 P.L. 1993, C. 318 (C. 2A: 44A-1 ET. SEQ.) NOTICE.

"I, MR. CLINTON C. BARLOW, II IS NOW...  
 HEREBY FILING AND PLACING AN COURT  
 "ORDER OF INJUNCTION RESTRAINING ORDER..  
 AGAINST: TRENTON Bd. OF EDUCATION INC.,  
 108 N. CLINTON AVE. TRENTON, N.J. 08609 AND  
 AGAINST N.J. SCHOOL Development Authority  
 32 EAST FRONT STREET, P.O. BOX 991, TRENTON,  
 N.J. 08628-0991, "TO STOP ANY PUBLIC BIDDING,  
 CONTRACTOR DEMOLISHING WORK," UNTIL MY,  
 CIVIL TORT CLAIM, IS SETTLED AND RESOLVED.  
 ..... Located:

• TRENTON CENTRAL HIGH SCHOOL BLDG.,  
 Blk. —, LOT — 400 Chambers Street...  
 TRENTON, N.J. 08608

"UNTIL I AM PERMITTED, TO ENTER INTO SCHOL  
 BLDG, TO START JUNK COLLECTION, SO THAT  
 I CAN DONATE HALF OF MONEY TO A  
 T.C.H.S. SCHOOL PROGRAM, TO HELP OUR  
 MOSTLY BLACK SCHOOL STUDENTS, LIKE...  
 DR. M. L. K. JR., TRIED TO HELP AMERICA."

PRELIMINARY STATEMENT

"ON THE DATES OF NOV. 10, 2014, STATE OF...  
 N.J. School Development Authority CEO and  
 N.J. TRENTON Bd. OF EDUCATION STAFFS had...  
 UNCONSTITUTIONAL Denied me, Mr. BARLOW III  
 Rights to Enter into Condemned T.C.H.S. Bldg.  
 To RETRIEVE AND Collect old Recyclables...  
 JUNKS" Before Bidding CONTRACT Goes out  
 To The Public, PURSUANT TO N.J. STATE App...  
 Court CASE OF: CARNEY, INC. V. City of Trenton,  
 -562 A.2d 807, (N.J. Super. Ct. App. Div. 1988),  
 Bidding doesn't Apply to me, UNDER CASE OF -  
 CITATIONS: 562 A.2d. 807, 235 N.J. Super. 372.

"PENDING PETITIONS WITH LOWER COURTS"

"AS OF DATES \_\_\_\_\_, 2014 AND \_\_\_\_\_, 2014,  
 I did Filed AN Education Admin. APPEAL...  
 AND A Civil Tort BREACH OF CONTRACT claim To  
 RESTRAIN BOTH Trenton Bd. OF EDUCATION...  
 AND School Development Authority CEO...  
 From CONTRACTING JOB To Demo. School,  
 NOT UNTIL I Rightfully RETRIEVE AND...  
 Collect All JUNKS From School For Free..  
 BECAUSE I Am A Black Minority U.S.,  
 CITIZEN RESIDENT OF TRENTON, N.J."...  
 N.J. CONTRACT Bidding LAWS doesn't...  
 Apply To me, BECAUSE, I Am WORKING...  
 FOR JUNK Collection NOT PAYMENTS."



Plaintiff is A N.J. Lic. H.I.C. Contractor...  
OF N.J., Who Cleans Out Houses And Bldg's...  
OF Recyclables And Junk For Owners For Free,"  
I've Been doing This Kind of Work...  
Since 1989 Thru - Present of Dec. 1, 2014,  
D.C.A. Stated That I don't Need Any Permit."

Now As of 10-31-14, I had Filed Several Writs...  
OF Petition with Trenton Bd. of Education  
And S.D.A., to Get Permission to Enter...  
into Condemned T.C.H.S. School Bldg., to  
Retrieve And Collect old Recyclable Junk,  
Before School is Demolished, By A N.J.  
Biding Construction, Inc.;" Because I Am  
doing Junk Collection For Free, And Part  
of Money is Going Back to A T.C.H.S.  
School Program; Biding doesn't Apply to me."  
562 A.2d 807 N.J. Super. Ct. App. 1988, STANO V. Soldo  
CONSTRUCTION CO. 187 N.J. Super. 524 (App. Div.  
1983), Not of bidder's P. Michele/A & Sons...  
Tamm Lamm, 56 N.J. Super. 199, 201-202 (App. Div.-  
1954) And Id. [187 N.J. Super.] At 535...  
Tup. of Brick V. Spivak, 95 N.J. Super. 401-406.  
(App. Div. 1967) Aff'd 49 N.J. 400 (1967) See..  
Also HANCOCK V. Bd. of Review, 46 N.J. Super.  
418, 421 (App. Div. 1957) STATE Biding doesn't  
Apply to me, So That Trenton Bd. of Educ..  
Order must Be Vacated And Reversed."

# STATEMENT OF THE CASE . . . . .

For several weeks, I had filed several writ of petitions to seek legal consent and permission to enter into T.C.H.S. school. . . . With several STATE OF N.J., County of Mercer, City of Trenton and Trenton Bd. of Education, but these Corps had UNCONSTITUTIONAL. . . . Denied my requests, as well as too. . . . Violating my Constitutional Rights. . . . "DUE PROCESS AND EQUAL PROTECTION OF LAW"

"That's why I plan to file several Government. . . . STATE, County, and City of Trenton civil torts. . . . AS WELL AS filing several Federal Complaints. . . . with U.S. President, U.S. HUD Secretary, U.S. Education Secretary, and U.S. Labor Secretary, U.H. Counsel, U.S. A.G., N.J. Governor, . . . , N.J. Civil Service, and Federal Court until. . . . I am rightfully granted and given. . . . LEGAL PERMISSION to enter into T.C.H.S.,"  
Under Authority of Cases:

- CARNEY, INC. V. City of Trenton, 562 A.2d 307, N.J. App.
- P. Michelotti & Sons V. Fair Lawn, 56 N.J. Super. 199 (1959)
- Top. of Brick V. Spivak, 95 N.J. Super. 401, 406 App. Div. 1967.
- Hancock V. Bd. of Review, 46 N.J. Super. 418, 421 A.D. (1957)
- EDWARD J. ROOE, INC. V. THE Bd. of EDUC. OF E. GRANGE,



Pp. # SUMMARY OF ARGUMENT

"THE T.B.E. AND S.D.A. employee Corps. -- did ERROR in Failing to GRANT me. -- Permission to Enter into T.C.H.S. Bldg. -- BECAUSE By me, Collecting old Junk for. -- Free, No Bidding doesn't Apply to me."

"S.D.A. AND T.B.E. Corps did ERROR. -- AND VIOLATED MY DUE PROCESS, AND EQUAL PROTECTION OF LAW, "BECAUSE I AM A BLACK MINORITY, AND NOT BIDDING to Demo Bldg. " I AM NOT TRYING to Demo ANY School. . . . Bldg. " ONLY WANT JUNK RECYCLABLES, AND I AM DOING WORK FOR FREE, to SHARE. . . PROFITS WITH T.C.H.S. PROGRAM."

"THEREFORE ANY Public Bidding to Demo A Bldg. doesn't Apply to me, BECAUSE I AM NOT CHARGING ANY PRICE, I AM DOING. . JUNK COLLECTION FOR FREE, BUT TRENTON Bd. OF EDUCATION AND S.D.A. C.E.O IS DISCRIMINATING AGAINST ME, MR. BARKER TELLING ME THAT MY REQUEST IS DENIED " THEY ARE UNCONSTITUTIONAL FORCING ME to Bid, WITH OTHER CONTRACTORS. YES, BUT MY ARGUMENT IS THAT MY BIDDING PRICE IS FREE BUT ONLY TO RETRIEVE. . . AND Collect old School JUNK."

Pp

"LOCAL MERITS & SUPPORT MY CASE"

"I CAN DEMONSTRATE A REASONABLE PROBABILITY OF EVENTUAL SUCCESS IN MY LITIGATION PROCEEDING TRIAL... AND I DO HAVE PROOF OF BURDEN... SEEKING MY RELIEF, TO MAKE "A"... PRIMA FACIE CASE SHOWING A TRUE... REASONABLE PROBABILITY THAT IT WILL... PREVAIL ON THE MERITS"; GRACEWAY PHARM, LLC -V- PERRIGO CO. 722 F. Supp. 2d 566, 569-70 (D.N.J. 2010); S&R CORP. -V- JIFFY LIKE INT'L INC., 968 F.2d 371, 379 (3d. CIR. 1992); AT. & T. CO. -V- WINHACK & CONSERVE PROGRAM INC 42 F. 3d 1421, 1427 N.8 (3d. CIR. (1994); Fed. R. CIV. P. 65(b)(1)(A); 11A CHARLES ALAN WRIGHT, ART. R. MILLER & MARY KAY KANE; FED. PRACTICE AND PROCEDURE § 2951 AT 253 (2d. ED. 1995)... THE ORDER IS DESIGNED TO PRESERVE THE... STATUS QUO, UNTIL THERE IS AN OPPORTUNITY TO HOLD A HEARING ON THE APPLICATION FOR A PRELIMINARY INJUNCTION.... F. Supp. 2d 508 (D.N.J. 1999); L. CIV. R. 71.

"I AM MAKING A CLEAR SHOWING OF... IRREPARABLE HARM ON AN APPLICATION... FOR A PRELIMINARY "COURT" INJUNCTION, 415 U.S. 423, 439-40 (1974); 35-2:1. 184PRA AND FEDERAL RULE 52(A) AND FED. R. 65(A)(2)

"is it Right For A Governmental... Unit... to Deny And Deprive... ANY TAX PAYERS OF Budget Community... PLAN Project," That doesn't Cost The... Public Residents OR TAX PAYERS NOT A dime... OR Red Cent. "All" Contractor is doing, Junk Collection Recyclable For Free."

"AND it's NOT LIKE T.B.E. OR S.D.A. is... PAYING to HAVE T.C.H.S. Demolished out OF Their own Pockets," using Their own money to PAY FOR Demo. Project...!!! And They ARE EVEN BEING PAID For their work," By US, The N.J. TAX PAYERS," OF AMERICA, STATE OF N.J., County of America. AND... CAPITAL City OF Trenton, New Jersey."

"Therefore I Am Emergent Moving to APPEAL Both S.D.A. AND T.B.E. ORDERS. Before N.J. STATE Admin LAW Judge... N.J. Mercer County Superior Court, N.J. STATE Superior Court, Appellate Division, N.J. STATE Supreme Court, N.J. STATE GOVERNOR'S OFFICE, U.S. Supreme Court AS WELL AS to N.J. TAX PAYERS, That's Why (Them) These Agency orders must be APPEALED, And GRANTED A temp. STAY." STATE Order Must Be OVERTURNED."



## CONCLUSION OF APPEAL

"

BEFORE BOTH N.J. STATE APPELLATE...  
DIVISION COURT AND THE N.J. STATE...  
SUPREME COURT OF NEW JERSEY...  
PLEASE KINDLY GRANT MY URGENT AND  
EMERGENT APPLICATION TO GRANT...  
MR. MR. BARLOW, III, A TEMP. STAY OF...  
T.B.E. AND S.D.A. NON BIDDING ORDERS  
TO BE PERMITTED TO ENTER INTO T.C.H.S.  
BLDG. TO RETRIEVE AND COLLECT OLD JUNK  
BEFORE SCHOOL IS DEMOLISHED BY A  
BIDDING CONTRACT CONSTRUCTION, INC.  
WHO HAS NOT YET BIDDED TO DEMO SCHOOL;

"

WHEREFORE PURSUANT TO N.J. STATE...  
APP. DIV. COURT PRECEDENTIAL CASE OF...  
CITATIONS: 562 A.2d 807, 235 N.J. Super 372,  
CARNEY, INC. V. CITY OF TRENTON, 562 A.2d 807,  
807, OF (N.J.) LOCAL PUBLIC CONTRACTS LAWS...  
N.J.S.A. 40A:11-1, ET SEQ. BIDDING PROCESS...  
DOESN'T APPLY TO ME BECAUSE I AM DOING...  
FREE WORK OF RETRIEVING AND COLLECTING  
OLD JUNK FROM T.C.H.S. SCHOOL BLDG. FOR...  
FREE, AND GIVING HALF OF PROFITS TO A...  
T.C.H.S. SCHOOL STUDENT PROGRAM."

YOUR HONORABLE N.J. JUDGES I SHOULD NOT HAVE TO LEGALLY FIGHT AGAINST... T.B.E. AND S.D.A. Corps For Some... Recyclable(s) Junk "it's A WASTE OF THOUSANDS OF TAX DOLLARS ON THEIR PART," THEY ARE JUST TRYING TO KEEP JUNK FOR THEIR BUSINESS BUDDIES AND THAT'S HUD DISCRIMINATION AND LABOR VIOLATIONS, SOMEONE NEEDS TO TELL THEM, THAT IT'S BETTER THAT THEY TRY... TO SETTLE WITH ME "BECAUSE I AM NOT... WALKING AWAY, JUNK BELONGS TO TAXPAYERS."

"AND IF I RECEIVE ANY NOTICES OF DEFENSE FROM, THE STATE OF N.J., ATTORNEY GENERAL'S OFFICE, ABOUT... TRYING TO STOP ME, FROM RETRIEVING... AND COLLECTING JUNK TRASH IN T.C.H.S." "I AM GOING STRAIGHT TO THE NEWS... PRESS, AND TO THE WORLD THAT N.J... GOVERNMENT IS FIGHTING ME FOR... SCHOOL JUNK," IF I SEE ONE... REPRESENTATION LETTER FROM... N.J. STATE ATTORNEY GENERAL, N.J. MERCER COUNTY COUNSEL, OR FROM... CITY OF TRENTON ATTORNEY, I AM THEN... GOING TO N.J. GOVERNOR CHRISTIE... MERCER COUNTY EXEC. BRIAN HUGHES, AND TRENTON MAYOR ERIC JACKSON...



FOR THE FOREGOING REASONS, THIS (N.J.)...  
HONORABLE COURT SHOULD HEREBY GRANT...  
ME," MR. CLINTON C. BARLOW, III, AN URGENT...  
EMERGENCY STAY... OF... N.J. S.D.A., T.B.E...  
AGENCY'S ORDERS THAT ARE NOT... LEGAL OF...  
ENFORCEMENT... BECAUSE CONTRACT BIDDING...  
DOESN'T (NOT) APPLY TO ME, CARNEY V. TRENTON, ETAL...  
562 A. 2d. 807, N.J. Super. COURT APP. DIV. 1988.

"ALL PARTIES WERE SERVED A COPY OF APPEAL,"

Respectfully Submitted...

MR. CLINTON C. BARLOW, III,  
N.J. H.I.C. CONTRACTOR...  
P.O. BOX 2134, TRENTON, N.J.  
08607

Xcc/:

THE HON. N.J. GOVERNOR CHRIS CHRISTIE, EDU...  
N.J. TRENTON BOARD OF EDUCATION, INC.,  
N.J. SCHOOLS DEVELOPMENT AUTHORITY,  
N.J. DEPT. OF COMMUNITY AFFAIRS BLDG. CODES,  
N.J. TRENTON CITY MAYOR AND CITY COUNCIL,  
THE HON. N.J. MERCER CO. EXEC. BRIAN M. HUGHES,  
THE HON. U.S. PRESIDENT B. OBAMA, W. H....,  
U.S. HUD SECRETARY OFC. OF CIVIL RIGHTS...  
U.S. ATTY GENERAL, DEPT. OF JUSTICE, D.C. J.

"I, Clinton C. Barlow, III Hereby Declared...  
That on Nov. 14, 2014 did serve a true...  
Copy of Federal Civil Action in Junction to All...  
Named N.J. STATE AND City of Trenton And...  
Trenton School Bd. of Education employees...  
My Alleges of Fed. Civil Rights, Breach of...  
Contract, And Unfair Bidding Process Writs...  
That was committed by Named defendants."

"ALL Parties WERE served..."  
"I Declared Under Federal Law..."

ENCLD. ARE MOTIONS TO Be GRANTED Fed...  
Court Informa Pauperis To Waive My Court...  
Costs. "PLEASE File My Fed. Civil Action."

SINCERELY

MR. CLINTON C. BARLOW, III  
P.O. BOX 2134, TRENTON,  
NJ 08607

Maip Duran

MAIPU DURAN  
NOTARY PUBLIC OF NEW JERSEY  
My Commission Expires 01/17/2018

CC/ ENCL. EXHIBITS "ATTY FOR N.J. GOVERNOR"  
C. N.J. STATE ATTY GENERAL JOHN HOFFMAN, % N.J.  
C. N.J. Mercer County Counsel, ART. SYPER, JR & MER,  
C. N.J. ATTY. DAVID L. MINCHELLO, FOR City of Trenton,  
C. N.J. ATTY. Kathleen Smallwood Johnson, FOR T. B. E.,  
CHON. U.S. HUD SECRETARY, O. C. R.,